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USWEST

Lawrence E. Sarjeant
Vice President -
Federal Regulatory

June 20, 1996

EX PARTE PRESENTATION

RECEIVED

JUN 20 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

RE: Implementation of the Local Competition Provisions
in the Telecommunications Act of 1996
CC Docket No. 96-98

Dear Mr. Caton:

On June 19, 1996, U S WEST, Inc. ("U S WEST") held two separate meetings at the Federal Communications Commission concerning the above-referenced proceeding. The first meeting was with James Schlichting, Chief of the Common Carrier Bureau's Competitive Pricing Division, Steve Weingarten and Richard Lerner. The second meeting was with Richard Welch, Chief of the Common Carrier Bureau's Policy and Program Planning Division, and Lisa Gelb. Also in attendance at the second meeting were David Nall, Deputy Chief (Legal), Commercial Wireless Division, Wireless Telecommunications Bureau, Zenji Nahazawa and Scott Kassma. In attendance at each meeting on behalf of U S WEST were Laura Ford, VP Public Policy; Mark Reynolds, Director of Interconnection Services; Cyndie Eby, Executive Director Federal Regulatory; and Lawrence E. Sarjeant, VP Federal Regulatory. Attached hereto are two copies of a document that was left with the FCC representatives during the meetings. During the meetings, the U S WEST representatives discussed the status of U S WEST Communications' ongoing local interconnection negotiations and the status of state regulatory proceedings in its service area concerning local interconnection.

In accordance with Commission Rule 1.1206(a)(1), two copies of the document left with the FCC staff accompany this notice of presentation and are being filed with you for inclusion in the public record. Due to the lateness of the hour when the last meeting concluded, this notice of presentation is being filed on the next day. Acknowledgment and date of receipt are requested. A copy of this transmittal letter is provided for this purpose. Please contact me if you have questions.

Sincerely,

Lawrence Sarjeant (cc)

Attachments

cc: Lisa Gelb
Scott Kassman
Richard Lerner
Zenji Nakazawa

David Nall
James Schlichting
Steve Weingarten
Richard Welch

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STATUS OF UNBUNDLING IN U S WEST COMMUNICATIONS STATES

The U S WEST Communications (USWC) states that having examined the issue of the degree of unbundling that is required for effective competition, have rejected the position of the incumbent interexchange providers that deep unbundling, and in particular, subloop unbundling, is necessary. They have required that loops and ports be unbundled, and that access to databases such as 800 and LIDB as well as signaling be provided along with access to Directory Assistance, Operator Services and Listings. Beyond these fundamental elements, which they have deemed not to be economically feasible to duplicate, they have directed the parties to use a bona fide request process.

The following is a brief summary of the proposed rules and orders.

Arizona

On January 2, 1996, the Arizona Corporation Commission issued Staff's proposed rule for comment.

Access to Databases and other Network Functions

- Incumbent LECs are required to provide non-discriminatory access to all necessary network functions, databases and service components required to provide competitive local exchange services. They include but are not limited to, DA database listings, white page listings, yellow page listings, 800 LIDB and AIN databases, CMDS hosting, busy line verification and busy line interrupt operator services, distribution of telephone directories, inclusion of CLEC information in the call guide section of the directory and E-911.
- Access to additional network functions, databases and service components may be required from time to time by order of the Commission. This does not preclude the parties from negotiating voluntary arrangements, which must be filed with the Commission and made available to other CLECs, under not-discriminatory terms and conditions, and pricing.
- Access shall at least be equal in type, quality and price to that provided to themselves, to any affiliate, from any affiliate, or to another incumbent LEC.
- LECs shall make available the call setup signaling resources and information necessary for setting up local and interexchange connections, including the use of signaling protocols used in the querying of data bases such as 800 and LIDB.

Unbundling

- Essential facilities shall be provided on terms and under conditions that are equivalent to the terms and conditions under which a LEC provides such essential facilities or services to itself in the provision of the local exchange carrier's services.
- Essential facilities are: termination of local calls, termination of long distance calls, interconnection with E911 and 911 services, access to numbering resources, dedicated channel network access connection and unbundled loops.
- A Bona Fide request process can be used to request unbundling of any network facility or service capability not previously identified. For 12 months following the effective date of these rules the incumbent LEC shall respond in writing within 120 days. Thereafter, a written response is due within 90 days. The written response must indicate if the LEC intends to deny or provide the unbundled element. If a LEC agrees to provide the element, a tariff shall be filed with the Commission within 150 days of the bona fide request. If a LEC does not intend to comply with the request the basis for the refusal shall be made clear. If a LEC asserts that unbundling the network facility or service is not technically feasible, notice to that effect shall be made to the requesting party and the Commission.

COLORADO

On March 29, 1996, the Colorado Public Utilities Commission issued the Decision Adopting Rules Regarding Requirements relating to Interconnection and Unbundling.

Unbundling Requirements

- Essential facilities or functions are; loop, local switching, common transport links, dedicated transport links, local and toll tandem switching, operator systems, signaling links, signal transfer points and access to each service control point via signal transfer points.
- AT&T and MCI argued that it is essential for the local loop component to be unbundled into three separate elements: loop feeder, loop concentration and loop distribution.
- The Commission held as follows: "USWC claimed that existing loop plant is not concisely segmented with clearly defined points of interface. New security procedures would be needed to assure network integrity. The fact is, unbundling the loop into feeder and distribution cannot be accomplished without significant expenditures to reengineer the way loops are provisioned. This comment, at the very least, raises questions regarding the advisability of loop unbundling as advocated by the new entrants. Additionally, the Act requires unbundling of the loop without any mention of further unbundling of the loop into subparts. At this time we decline to adopt the AT&T/MCI suggestion."
- A detailed record of all requests for unbundling shall be maintained by the providers requesting such unbundling and filed quarterly with the Commission. This information should detail the interaction and provide the provider's response. At any time when a disagreement arises between providers regarding the provision of interconnection or unbundling under these rules, either party may file a complaint with the Commission.

IOWA

Final Rules were issued on April 5, 1996. The Rules addressed the issues of:

Unbundling

- USWC should file at a minimum: loops, ports, signaling links, signal transfer points, facilities to interconnect unbundled links at the central office, interoffice transmission facilities, directory listings in white pages, directory listing in yellow pages, listings in the DA database, inbound operator services including busy line verification and call interrupt, interconnection to the 911 system and interconnection to the tandem switch for routing to other carriers.
- A bona fide request can be made for additional unbundling
- Interconnection to essential facilities shall be technically and economically equivalent to those under which the LEC provides those facilities to itself or its affiliates.

WASHINGTON

The Washington Utilities and Transportation Commission issued the Fourth Supplemental Order in Docket Nos UT-941464, UT-941465, UT-950146 and UT-950265 on October 31, 1995.

Unbundling

- The Commission held as follows: "It appears that the Commission need not order unbundling at this time, given USWC's representative that it will file an unbundled loop tariff, and the apparent lack of an immediate need for more extensive unbundling. At this time, the Commission is satisfied with a first level of unbundling that includes an unbundled loop and an efficient line-side interconnection. Thus, while we would prefer that companies step forth with unbundling tariffs, for now the Commission supports a bona fide request procedure proposed by Commission Staff."

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